From: Brian Kelder [mailto:briankelder@gmail.com]
Sent: Thursday, April 05, 2012 2:02 PM
To: Baskin, Kathleen (EEA)
Subject: Comments on SWMI Framework

Kathleen Baskin, P.E.
Director of Water Policy and Planning
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA

Dear Ms. Baskin,

I am writing in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012. As a professional aquatic ecologist and an outdoor enthusiast, I am all too familiar with the level of stress many of our waterways and associated aquatic communities are under. I am particularly concerned that these systems will continue to degrade without a fundamental shift in how we value and manage our most precious resource; clean, fresh water. Unfortunately, in its current form the SWMI Framework falls disappointingly short of what is needed.

I appreciate the tremendous effort that state staff and others have dedicated to the SWMI process. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward. However, serious weaknesses in the proposed SWMI Framework undermine its credibility, negate its effectiveness and thwart truly sustainable water management. These deficiencies must be addressed.

The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. The ecological health of our waterways cannot and should not be seen as a luxury to be met only after all the region's lawns, swimming pools and golf courses have the water they want. Our aquatic ecological resources are simply too valuable to our regional heritage and economy, not to mention our well-being. Instead, protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows "non-essential" water use when flows are below safe levels. This is not sustainable water management. This, quite frankly, is ignoring scientific findings in order to promote the status quo.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from falling below safe levels or being pumped dry; this is unacceptable. We can and must do better. We must seize this once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research.

Thank you for the opportunity to comment.

Sincerely,

Brian Kelder
Arlington, MA